

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF COOK )

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CRIMINAL DIVISION

THE PEOPLE OF THE  
STATE OF ILLINOIS,

Plaintiff,

-VS-

Kathleen Barth,

Defendant.

13MC1- 13113312

**PEOPLE'S FACTUAL PROFFER**  
**IN SUPPORT OF RECONSIDERING BOND**

NOW COME the People of the State of Illinois, Plaintiff herein, through their attorney ANITA ALVAREZ, State's Attorney of Cook County, by hers Assistant John Carey and Paul Kiefer, and hereby present their factual proffer in support of setting bond.

I. Introduction:

Section 5/110-5 of the Illinois Code of Criminal Procedure sets forth criteria relevant to determining the amount of bail and conditions of release. 725 ILCS 5/110-5. The information used by the Court in its findings with regard to setting the amount of bail may be presented by way of written proffer based upon reliable information offered by the State. 725 ILCS 5/110-5.

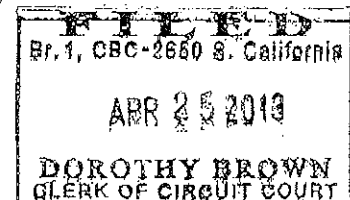
Defendant Kathleen Barth ("Defendant") is initially charged by way of Complaint for Preliminary Examination with the felony offense of Theft of Property exceeding \$1,000,000, 720 ILCS 5/16-1(a)(1)(A) (Class X Felony).

II. Defendant:

Defendant is 56 years of age and resides in the 1700 block of north Rutherford, Chicago, IL. Defendant was previously employed as the general manager of the victim, Kraft Chemical Corp. of Melrose Park, IL.

III. The Facts:

The Defendant was employed at Kraft Chemical from April of 2005 through April of 2012. As General Manager of Kraft Chemical, the Defendant was entrusted with complete control of all financial matters including payroll, accounts receivable and accounts payable. Between on or about May 1, 2006 through on or about April 25, 2012, the Defendant used this trust to steal approximately \$2,190,000 from Kraft Chemical.



The Defendant stole these funds primarily in four distinct ways: The Defendant stole approximately \$840,735 by fraudulently increasing her salary and by giving herself frequent unauthorized bonus and commission checks. The Defendant stole approximately \$990,645 from Kraft Chemical by electronically transferring funds from Kraft Chemical's business checking account to her personal credit card accounts for charges that were non work related. The Defendant stole approximately \$258,000 by issuing unauthorized Kraft Chemical checks directly to herself. Finally, the Defendant stole approximately \$100,000 by having Kraft Chemical checks issued to pay contractors who remodeled the kitchen and a bedroom in her home.

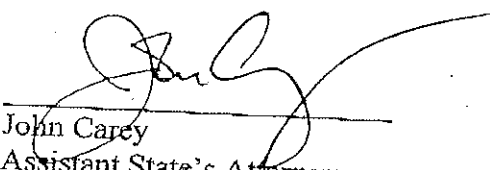
IV. Bond Recommendation:

Section 5/110-5 of the Illinois Code of Criminal Procedure sets forth criteria relevant to determining the amount of bail and conditions of release. 725 ILCS 5/110-5. In particular, the Court may consider the likelihood of conviction and the amount of proceeds unrecovered. Based upon matters discussed herein, the People of the State of Illinois recommend that this Honorable Court hold a hearing to reconsider bond and set a substantial bond in this case, given the fact that \$2.1 million has been stolen, and that this Court, as special conditions of release, require the Defendant to surrender her passport.

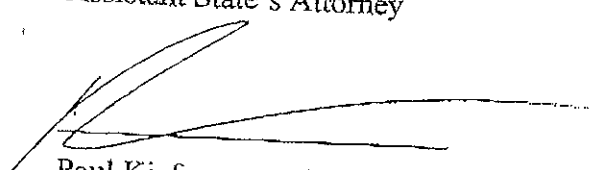
Respectfully submitted,

ANITA ALVAREZ  
STATE'S ATTORNEY OF COOK COUNTY

BY:



John Carey  
Assistant State's Attorney



Paul Kiefer  
Assistant State's Attorney